

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA ) Criminal No. 05-10016-RCL  
)  
v. ) **VIOLATIONS:**  
)  
1) NUEREL CARR, ) 21 U.S.C. § 963 - Conspiracy to  
2) MICHAEL MCDONALD, ) Import Cocaine  
3) DONOVAN SORRELL, )  
Defendants. ) 21 U.S.C. §§ 952(a) & 960(a) -  
 ) Unlawful Importation of Cocaine  
 )  
 ) 18 U.S.C. § 2 - Aiding and Abetting  
 )  
 ) 21 U.S.C. § 841(a)(1) - Possession  
 ) With Intent to Distribute Cocaine  
 )  
 ) 21 U.S.C. § 853 - Criminal  
 ) Forfeiture

UNITED STATES' BILL OF PARTICULARS  
FOR FORFEITURE OF ASSETS

The United States of America, by and through its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

The Forfeiture Allegation of the Indictment seeks the forfeiture, pursuant to 21 U.S.C. § 853 as a result of the offenses alleged in Counts One through Four of the Indictment, of any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations, including, but not limited to the following:

1) one 2000 Nissan Pathfinder, Vehicle Identification No. JN8AR07Y2YW423553, seized from Michael McDonald, on or about November 24, 2004.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Shelbey D. Wright  
DAVID G. TOBIN  
SHELBEY D. WRIGHT  
Assistant U.S. Attorneys  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3100

Dated: March 23, 2005

CERTIFICATE OF SERVICE

I certify that I have served a true copy of the foregoing upon John M. Moscardelli, Esquire, Peters & Moscardelli, Eight Winter Street, 12<sup>th</sup> Floor, Boston, Massachusetts 02108, as counsel for Defendant Michael McDonald, by first class mail, postage prepaid.

/s/ Shelbey D. Wright  
Shelbey D. Wright  
Assistant U.S. Attorney

Dated: March 23, 2005